

**ecology and environment. inc.**

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August 18, 1997

Ms. Peggy Hendrixson (MC-10J)
ARCS 5 Contracting Officer
United States Environmental Protection Agency
Contracts and Procurement Section
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Transmittal of the Sauget Area 1 and 2 Sites Technical Assistance Revised Work Plan
Section 3, ARCS Contract 68-W8-0086, WA No.47-5N60.

Dear Ms. Hendrixson:

As per my phone conversation with Ms. Leah Evison on August 18, I am enclosing one copy of the Sauget Area 1 and 2 Sites Revised Work Plan (WP) Section 3. Text changes from the original August 11 submittal are shaded. In addition "Table 3-1" presented on Page 3-10 of the Work Plan is changed to Figure 3-1. The cost assumptions and cost detail sheets for the technical assistance tasks described in the WP have not changed from the original submittal. The WP is considered final with submittal of the revised Section 3 and following your review and approval, E & E will provide you with a completed Standard Form 1411 and Optional Form 60.

E & E has provided both Ms. Leah Evison, the Work Assignment Manager and Ms. Pat Vogtman, Project Officer, with one copy of the revised WP Section 3.

If there are any questions or comments concerning this submittal, please do not hesitate to contact Craig Carlson or me. As always, thank you for your assistance on this project.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

Dan Sewall
ARCS Program Manager

Enclosures

cc: L. Evison, EPA WAM
P. Vogtman, EPA CO
C. Carlson, E & E PM

3

Description of Work

The tasks that will be conducted to accomplish the SOW objectives for the Sauget Area 1 and 2 sites are presented in this section. The following tasks will be conducted for the project:

- Task 1.0: Project Planning and Support;
- Subtask 1.1: Project Planning;
- Subtask 1.2: Project Management;
- Task 2.0: Acquisition of Existing Information;
- Task 3.0: Property Ownership Tables and Maps;
- Task 4.0: Technical Data Summary Tables and Maps;
- Task 5.0: Data Gaps Memoranda; and
- Task 6.0: PRP Records Compilation.

As specified by the SOW and in discussions with EPA, the work breakdown structure for each of these primary tasks includes subtasks for financial tracking and management purposes. The activities to be conducted by E & E for each of the above tasks and their associated subtasks are described below.

3.1 Task 1.0: Project Planning and Support

3.1.1 Subtask 1.1: Project Planning

E & E prepared this Work Plan (WP) to include a detailed description of the tasks to be conducted under this work assignment. E & E attended a kick-off meeting for the project on July 23, 1997. A revised SOW was issued in Work Assignment Form (WAF) Revision 1

based upon discussions between E & E and EPA at the meeting. This WP includes a detailed description of the approach for the technical and PRP data compilation activities in accordance with SOW Revision 1. Specifically, the items included in this WP include:

- E & E's technical approach for each task to be performed, including a detailed description of each task; the assumptions concerning the technical effort required for the task; the information needed for each task; any information to be produced during and at the conclusion of each task; and a description of the work products that will be submitted to EPA (see the project schedule in Section 4);
- A schedule showing the dates for completion of each task and subtask and submission of each deliverable required by the EPA SOW. The schedule includes information about timing, initiation, and completion of all critical path milestones for each activity and deliverable, and the expected review time for EPA (Section 4);
- A cost estimate to complete the work assignment is attached to the transmittal letter for this Work Plan. The cost estimate includes a breakdown of the cost and Level of Effort (LOE) by labor category for each subtask of the work assignment. The primary assumptions used in developing the cost estimate are also detailed in the attachment.

After submittal of the WP, E & E will attend a fact finding/negotiation meeting with EPA, if needed. At this meeting, EPA and E & E will agree upon a final technical approach and associated costs required to accomplish the project objectives. If requested by EPA, E & E will prepare a revised Work Plan after the fact finding/negotiation meeting. This final Work Plan will be submitted to EPA within 15 days after the meeting.

In addition to preparation and submittal of the project WP, the E & E project manager will conduct a one-day site visit with the EPA Work Assignment Manager (WAM) and the IEPA Project Manager (PM) during the project planning phase in order to familiarize himself with the project and develop a conceptual understanding of the site, as directed in the SOW.

3.1.2 Subtask 1.2: Project Management

E & E will perform general work assignment project management including: weekly communication of project progress and status with the WAM; management, file maintenance, forecasting, and tracking of costs; preparation of Monthly Progress Reports; attendance at project meetings; and final project closeout. It is anticipated that the period of performance

for this project will be from July 1997 through February 1998. The primary project management activities are further described below.

Prepare Monthly Status Reports

E & E will prepare Monthly Progress Reports. These reports will document the technical progress and status of each task and subtask for the reporting period in accordance with contract requirements. E & E will report costs and LOE by P-level for the reporting period, as well as cumulative amounts expended to date. Monthly invoices will be prepared and submitted in accordance with the level of detail specified in the ARCS contract. In addition to the monthly cost reporting, E & E will notify the Project Officer, Contracting Officer (CO), and WAM in writing when the 75% and 95% levels of the approved work assignment budget have been expended.

Participate in Meetings and Routine Communications

E & E will attend project meetings, document meeting results, and contact the WAM by telephone, as required, to report project status. A total of two meetings attended by two E & E personnel will be assumed for this project after submittal of the final WP, as specified in the SOW. These two meetings are progress update meetings to be conducted as the project progresses from the point of the work plan approval. In accordance with the SOW, E & E will communicate (either face-to-face or by telephone) with the WAM on a weekly basis, at a minimum, to report project status.

Close Out Work Assignment

E & E will perform the necessary activities to close out the Work Assignment in accordance with ARCS contract requirements. Closeout activities include:

- **Return Documents to EPA.** E & E will complete any document control activities, will box up all draft and final versions of all deliverables and raw data, and send them to the EPA Region 5 Superfund Records Center, or as directed in the Work Assignment Closeout Notification (WACN); and
- **Prepare Work Assignment Closeout Report (WACR).** E & E will prepare and submit a WACR as directed in the WACN.

3.2 Task 2.0: Acquisition of Existing Information

Under this task, E & E will locate all existing technical and PRP information concerning the Sauget Area 1 and 2 Sites held by, but not limited to, the agencies and municipalities listed below:

- U.S. EPA Region 5 Offices in Chicago:
 - Superfund Division
 - Waste, Toxics, and Pesticides Division
 - Water Division
- IEPA Offices (Springfield and Collinsville):
 - Superfund Program
 - RCRA Program
 - Water Programs
- Miscellaneous Federal Agencies:
 - U.S. Fish and Wildlife Service
 - U.S. Food and Drug Administration
 - U.S. Department of Agriculture
 - U.S. Army Corps of Engineers
- Miscellaneous State and Local Agencies:
 - Illinois Department of Public Health
 - Illinois Department of Transportation
 - St. Clair County
 - Village of Sauget and Fire Department
 - Village of Cahokia and Fire Department
 - East Side Health Department

E & E will contact the sources listed above, by telephone, to inquire about file materials, if any, that may be pertinent. File searches will be scheduled and conducted based on the results of these inquiries. E & E assumes, at a minimum, that one week will be required to review IEPA files in Springfield and one week will be required to review files from sources in the site area.

Other sources of information may be investigated in addition to those listed above. At each location listed above, and any others investigated, E & E shall develop a log of all sources of information present at each location. While conducting the file searches through the aforementioned locations, E & E will copy all file information relating to the following:

- Current property ownership information;
- Analytical data for any Area 1 or 2 site;

- Waste generator or disposal information;
- PRP information or liability; and
- Any other information E & E deems useful for completion of the work assignment.

E & E will contact the WAM frequently during the file searches in order to decide what files to copy for the work assignment. The information obtained by list or copied for transport back to E & E's Chicago office will be incorporated in one or more databases of information for the project. The list of information to be compiled for each source location is discussed in further detail under Task 4. Each piece of file information copied for the master site file will be indexed using a Bates stamp, indexed accordingly, and referenced in any site deliverables based upon the Bates stamp number.

3.3 Task 3.0: Property Ownership Tables and Maps

Under this task, the information obtained during file the searches of the various agencies regarding current property ownership for the Area 1 and 2 Sites will be compiled and summarized. Current property ownership will be determined by conducting a deed search at the St. Clair County Tax Assessor's Office in Belleville, Illinois, and information regarding ownership will be supplied for each subunit (e.g., Site G, Site H) of each of the Area 1 and 2 Sites. In addition, names and addresses of contiguous property owners will also be compiled for this task. All property owner information will be supplied in a table showing names and addresses, with a map keyed to the property owner table. Copies of all property legal descriptions will be obtained during the deed search and will be provided along with the appropriate property tables and maps. Separate tables and maps will be produced for the Sauget Area 1 and Sauget Area 2. An example of a proposed property ownership table is presented as Table 3-1. The property owner tables and maps completed under this task will be submitted to EPA within 60 calendar days after the work plan approval date.

3.4 Task 4.0: Technical Data Summary Tables and Maps

This task will be used to compile and summarize all technical data for each subunit of the sites and for groundwater at each site. The information obtained will be compiled directly into summary tables for each subunit or into a database for each site area. The volume and types of data obtained will determine which format will be used. If a database format is

chosen to compile the data, E & E will use information extracted from this database to create data summary tables, and data will also be presented on the maps developed for the Sauget Area 1 and Sauget Area 2 sites.

Information Database

E & E may compile a technical information database incorporating all information collected during performance of the tasks in this work assignment. If a database format is chosen for this task, E & E intends to use ACCESS database software, although selection of the database software is subject to EPA approval. The ACCESS database can be manipulated to produce the required project tables using a variety of sorting factors.

Data Summary Tables

E & E will organize the technical data into separate summary tables for the Sauget Area 1 and Area 2 sites. These summary tables will be further organized by individual sites (e.g., Site R) within each Sauget Area. In addition, technical data will be organized to evaluate evidence of groundwater contamination at each site. The data summary tables, organized by site within each Sauget site area (1 and 2), will be accompanied by a narrative description of the data. The narrative shall, at a minimum, include the sources of data used to compile the summary tables, a description of the nature and extent of contamination (including known contaminant sources, distribution, and trends), and the containment and its integrity, if known. An example of the proposed data summary table format is presented in Figure 3-1.

Three copies of the draft technical data tables will be submitted to EPA within 90 days after approval of the work plan (assuming ready availability of file information from the sources listed). Based on E & E's familiarity with the project area and past experience, a large volume of data regarding the site areas is anticipated. E & E and the WAM have agreed to assume that the summary tables could consist of approximately 2,500 discrete samples for data entry purposes. Technical submittal milestones may need to be altered based upon availability and quantities of data encountered during the file searches. After receipt of EPA comments on the draft technical summary tables, E & E will incorporate the appropriate changes based upon the comments and submit three final copies of the technical data summary tables within 30 days after receipt of EPA comments on the draft.

Maps

E & E will develop site maps for Sauget Area 1 and Sauget Area 2. The Area 1 and Area 2 maps will include the location of all subunits, sample locations, selected contaminants, and contaminant levels. The selected contaminants to be presented on the area maps will be determined in discussions with the WAM after E & E has had the opportunity to examine the existing analytical data and the types and diversity of contaminants evident in the file information. The maps may be produced by subunit rather than area, depending upon the scale and numbers of samples and data that need to be presented. An example of a possible format for the site maps and data has been presented to and discussed with the WAM.

Three copies of the draft maps will be submitted to EPA within 90 days after approval of the work plan. Again, as indicated above, technical submittal milestones may need to be altered based upon availability and quantities of data encountered during the file searches. After receipt of EPA comments on the draft maps, E & E will incorporate the appropriate changes based upon the comments and submit three final copies of the maps within 30 days after receipt of EPA comments on the draft.

3.5 Task 5.0: Data Gaps Memoranda

Following the evaluation of the technical data and information summarized under Task 4.0, E & E will assess the contaminant distribution and trends, and identify any data gaps that appear to exist within a given area or subunit. E & E will develop and deliver a memorandum for each of the two site areas, which will discuss the data gaps identified from the existing technical information. The memoranda will briefly discuss the history of the site areas and subunit(s), the samples collected to date, the nature and extent of contamination, and the apparent data gaps identified through review of this information. These memoranda will be delivered to EPA within 30 days after submittal of the draft technical data tables and maps.

3.6 Task 6.0: PRP Records Compilation

PRP Files Setup

E & E will compile any file records that are relevant to a PRP search, according to Section 3.1.1 of the *Potentially Responsible Party Search Manual* (OSWER Directive 9834.6). Relevant Sauget Area 1 or Area 2 site PRP records will include, but not be limited to, correspondence, hazardous waste manifests, technical data and reports, permits,

complaints, investigations, fire department chemical reports, litigation files, bankruptcy files, responses to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 104(e) information requests, and any other relevant records. These records will be copied from the file searches described earlier and organized in specific PRP files. The PRP-specific files will be categorized using either a Bates stamp or other unique numbering system to sequentially number all documents within a file. E & E will also create an index for those items pertaining to either 1) several PRPs, or 2) discussing subjects of a general nature. Material specific to one PRP will be filed with other documents pertaining to that PRP, thereby creating a liability file of evidence for each PRP.

PRP Database

After completion of the file searches and data compilation, E & E will compile a PRP database, using the proposed ACCESS database software (subject to EPA approval), that summarizes the existing PRP information and any additional PRP information gathered during the file searches. The PRP database will include, but not be limited to, the information that was presented in Attachment 5 of the initial SOW. An example of the proposed database data entry format and an example of the listing format for the PRP information are presented in Attachment 1. Two copies of the PRP database will be submitted to EPA within 90 days of work plan approval by EPA. After receipt of comments from EPA, a final PRP database will be submitted within 30 days of receipt of agency comments.

PRP Waste Disposal Personnel List

E & E will compile a list of all persons linked to waste disposal for each PRP, using the information obtained from the PRP files. The waste disposal personnel information shall include, but not be limited to, names, addresses, telephone numbers, company position, and involvement with waste disposal. Two copies of the PRP Waste Disposal Personnel List will be submitted to EPA within 90 days of work plan approval by EPA. After receipt of comments from EPA, a final PRP Waste Disposal Personnel List will be submitted within 30 days of receipt of agency comments.

Table 3-1 SAMPLE PROPERTY OWNERSHIP TABLE SAUGET AREA 1 SITES*			
Area Subunit	Reference No.	Tax Parcel No.	Property Owner (Name, Address, Phone)
G	G-1	1-26-401-6	Mr. John Doe 2283 Main Street Anywhere, USA 90995 (333) 333-3333
	G-2		
	G-3		
	G-4		

Note: The sample table has been only partially filled in. The actual table would be completely filled in.

* A separate table will be prepared for the Sauget Area 2 sites.

SAUGET AREA 1 SITES

SOIL SAMPLES - SITE M

Volatile Organic Compounds (UG/KG)

Sample Number	Q	Q	Q	Q	Q	Q	Q	Q	Q	Q	Q	Q	Maximum
Sample Depth (ft)	U	U	U	U	U	U	U	U	U	U	U	U	Concentration
Date Collected	A	A	A	A	A	A	A	A	A	A	A	A	Detected
VOC	L	L	L	L	L	L	L	L	L	L	L	L	
Chloromethane													
Bromomethane													
Vinyl chloride													
Chloroethane													
Methylene chloride													
1,1-Dichloroethene													
1,1-Dichloroethane													
1,2-Dichloroethene (total)													
Chloroform													
1,2-Dichloroethane													
1,1,1-Trichloroethane													
Carbon Tetrachloride													
Bromodichloromethane													
1,2-Dichloropropane													
trans-1,3-dichloropropene													
Trichloroethene													
Dibromochloromethane													
1,1,2-Trichloroethane													
Benzene													
cis-1,3-dichloropropene													
2-Chloroethylvinyl ether													
Bromoform													
Tetrachloroethene													
1,1,2,2-Tetrachloroethane													
Toluene													
Chlorobenzene													
Ethylbenzene													
Acetone													
Carbon disulfide													
2-Butanone													
Vinyl acetate													
2-Hexanone													
Styrene													
Total xylenes													
4-Methyl-2-pentanone													

FIGURE 3-1 PROPOSED DATA SUMMARY TABLE FORMAT